

### **REMARKS**

Applicant thanks the Examiner for the careful review of this application. The specification and claims 2, 11 and 21 were amended. New claims 22-27 were introduced for consideration. No new matter was added. Claim 1 was previously canceled. Therefore, claims 2-27 are currently pending in this application.

### **REJECTIONS UNDER 35 U.S.C. § 102(b)**

Claims 2, 3, 11 and 21 were rejected under 35 U.S.C. § 102(b) as being unpatentable in view of Todd (U.S. Patent No. 6,252,739). Applicant respectfully traverses.

Todd apparently discloses a tape drive having a magnetic head cleaning apparatus comprising a frame, a read and write magnetic head attached to the frame, a flexure supported by the frame for relative movement between the frame and the read/write magnetic head, and a brush attached to the flexure for cleaning debris off the magnetic head. The read/write magnetic head attached to the frame is configured for reading and writing data to and from a storage medium. The flexure, having the brush attached thereon, moves upward and down with respect to the frame and the read/write magnetic head to clean the magnetic head. The flexure biases the brush toward the read/write magnetic head to insure brush contact with the magnetic head.

Independent claims 2, 11 and 21 have been amended to recite that a single cleaning cycle comprises the brush moving along the read/write head along a first direction and then along a second opposite direction. Additionally, the single cleaning cycle is triggered by a single event. The single event is further defined in new dependent claims 22, 24 and 26 which specify that the single event is completion of winding of a tape onto a tape cartridge. Furthermore, new dependent claims 22, 25 and 27 specify that the brush moves in the second opposite direction immediately after movement in the first direction has completed.

In marked contrast, Todd's brush does not clean the head in a single cleaning cycle that is triggered by a single event. Instead, Todd's cleaning cycle is triggered by multiple events. Specifically, Todd's brush 24 is first activated when a tape cartridge load event. When the cartridge is inserted / loaded, Todd's brush is moved down along the length of the brush before the tape is in the vicinity of the head. Todd's brush then stays at a position below the head until a second event occurs. That second event is the unloading of the cartridge. When that second event occurs, Todd's brush sweeps back up the head. Due to these aspects of Todd's disclosure, Applicant respectfully submits that Todd's multiple cleaning cycles are triggered by multiple events – loading and unloading of the tape cartridge. Additionally, Todd does not disclose that the brush moves in the second opposite direction immediately after movement in the first direction has completed as disclosed via new claims 23, 25 and 27.

In view of the foregoing, Applicant respectfully requests withdrawal of the rejections of claims 2, 3, 11 and 21.

#### **REJECTIONS UNDER 35 U.S.C. § 103(a)**

Claims 4, 12-13, 16 and 18-19 were rejected under 35 U.S.C. § 102(b) as being allegedly unpatentable over Todd in view of Davis (U.S. Patent No. 6,867,947). Claims 5-6, 10, 14-15 and 20 were rejected under 35 U.S.C. § 102(b) as being allegedly unpatentable over Todd in view of Nayak (U.S. Patent No. 6,697,230) and further in view of Townsend (U.S. Patent No. 4,139,877). Claims 7, 9 and 17 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Todd in view of Nayak and further in view of Nanba (U.S. Patent No. 3,774,916).

The M.P.E.P. sets forth the strict legal standard for establishing a *prima facie* case of obviousness based on modification or combination of prior art references. "To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the

reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references where combined) must teach or suggest all the claim limitations." M.P.E.P. § 2142, 2143. The teaching, suggestion, or motivation for the modification or combination and the reasonable expectation of success must both be found in the prior art and cannot be based on an applicant's disclosure. *See Id.* (citations omitted). "Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art" at the time of the invention. M.P.E.P. § 2143.01. Even the fact that references can be modified or combined does not render the resultant modification or combination obvious unless the prior art teaches or suggests the desirability of the modification or combination. *See Id.* (citations omitted). Moreover, "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art." M.P.E.P. § 2143.03 (citations omitted).

Todd was previously summarized. Davis apparently discloses a threader assembly for a tape drive that has a retractable, low profile head brush assembly that is articulated into and out of wiping contact with the tape head. The head brush assembly is integrated into the threader assembly such that the same components used to load and unload the media tape also articulate the head brush assembly. The head brush assembly includes a set of bristles that are mounted to a brush arm. The head brush assembly has a cleaning position for placing the bristles in contact with the tape head. When the head brush assembly is in the cleaning position, the tape head is cleaned through oscillation of the head via a coarse track following actuator. The head brush assembly also has a storage position wherein the entire head brush assembly is

pivotaly retracted away from the tape head without interfering with other components of the threader assembly.

Nayak apparently discloses a head positioner arrangement for a tape drive includes a head positioner with a guidance system and a prime mover system, and a floating nut that is positioned between the prime mover system and the guidance system. The floating nut has a three-point contact to the prime mover system. The three-point contact absorbs errors from the prime mover system and prevents these errors from interfering with the guidance system.

Townsend apparently discloses a floppy disk magnetic information storage and retrieval unit with a stepping motor lead screw driving a half-nut of the read/write head carriage. The read/write head carriages used are interchangeable modules and the stepper motor, carriage drive lead screw and a mounting plate are also in the form of interchangeable modules for floppy disk units equipped with registration banking button positioning for minimized tolerance variation between interchangeable modular assemblies for simplified reliable field maintenance and lower cost.

Nanba apparently discloses a tape recorder that employs a plurality of endless tape cartridges. The plurality of endless tape cartridges comprises storing means for storing a plurality of endless tape cartridges, playing means for reproducing the sound of the tape cartridge, carrying means for carrying the cartridge from the storing means to the playing means and from the playing means to the storing means, and control means for controlling the storing means, the playing means and the feeding means electrically and co-relatively. Said storing means is provided with a plurality of cases attached to rotatable endless chain means so as to move with the chain means, each of said cartridges being stored in the appropriate case so as to move along transverse direction against advancing direction of the case for feeding the cartridge to the playing means by the aid of carrying means, whereby selection of the desired cartridge from

the stored cartridges, conveyance and feed of the selected cartridge to the playing means, reproduction and return of the cartridge can be automatically performed.

Due to similar reasons put forth in the previous section regarding Todd and the claim amendments, Applicant respectfully submits that Todd in various combinations with Nayak, Townsend and Nanba also do not disclose the claimed embodiments. Due to this, Applicant respectfully requests the withdrawal of the rejections of claims 4-10, 12-20.

### **CONCLUSION**

Applicant believes that all pending claims are allowable and a Notice of Allowance is respectfully requested.

If the Examiner believes that a conference would be of value in expediting the prosecution of this application, he is cordially invited to telephone the undersigned counsel at the number set out below.

Respectfully submitted,  
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